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To: <wvogl@samhsa.gov>
Date: 7/8/04 8:00PM
Subject: regarding FR DOc 04-7984

I am supporting the views of the International Paruresis Association and am in favor of the submission below. Drug testing laws should be done by physicians and medical people and only by method of blood tests-not urine.

Federal Register Document Number 04-7984
Public Comment 8400057

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REGARDING: FR DOC 04-7984

DATE: June 28, 2004

The attached document provides comments from the International Paruresis Association (IPA) in response to the Health and Human Services (HHS) proposed guideline changes for drug testing procedures (FR DOC 04-7984). We offer these

comments on behalf of the millions of Americans afflicted with paruresis, better known as shy-bladder syndrome, who are physically unable to comply with SAMHSA's proposed guidelines for drug testing procedures. Inasmuch as shy-bladder syndrome is a misunderstood, humiliating disorder, its victims rarely discuss its devastating effects, particularly with employers, for fear of retribution. The IPA seeks reasonable accommodation for these persons through means indicated in the attached comments.

Due to lack of public awareness and significant misinformation about shy-bladder syndrome we have incorporated background information with our comments. The IPA is convinced, after reading drug testing guidelines from both HHS and DOT, that the special needs of paruretics have not been taken into account when drug testing guidelines have been formulated. Over the past several years, the IPA has conducted numerous workshops throughout the United States and several other countries to help people overcome this disorder. We have helped people from all walks of life: psychiatrists, psychologists, police officers, commercial pilots, Armed Forces personnel, lawyers, managers, engineers, scientists, truck drivers, entrepreneurs, artists, and so forth. Many of these people are not drug users, but are unemployed or underemployed simply because they are unable to provide a urine specimen under current drug testing procedures.

The IPA believes this situation is a grave injustice. Existing drug testing

rules present a virtually impossible hurdle for those who suffer from shy-bladder syndrome and too often these rules have resulted in drug-free workers losing long-term careers or not being able to enter the labor pool. This practice is unfair for those people who have never taken illegal drugs but simply cannot prove their innocence by providing a urine sample under the current or proposed guidelines. We would be remiss not to mention the large volume of phone calls, letters, email, and posts on our Web site from persons in this category. We believe that current drug testing rules shortchange workers and employers and do not allow for reasonable accommodation. As a result, many organizations now face legal proceedings that would be unnecessary if drug testing guidelines were written with an understanding of shy-bladder syndrome. The need for better written rules is all the more essential as increasing numbers of public schools are mandating drug testing as a condition for participation in extracurricular activities.

In reading our comments, please keep in mind that as an organization the International Paruresis Association is neither for nor against drug testing. Our issue centers on how drug testing is done, not whether it is done. Now is the time to promote drug testing rules that are fair to all.

We thank you for the opportunity to provide our comments and hope that you will take them into account when making final revisions to the drug testing guidelines. Please contact us if further information is needed.

Best regards,

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